DAVIS WRIGHT TREMAINE LLP THOMAS R. BURKE (State Bar No. 141930) thomasburke@dwt.com 505 Montgomery Street, Suite 800 San Francisco, CA 94111-6533 Telephone: (415) 276-6500 FILED CLERK, U.S. DISTRICT COURT Fax: (415) 276-6599 APR 2 0 2015 DAVIS WRIGHT TREMAINE LLP DAN LAIDMAN (State Bar No. 274482) CENTRAL DISTRICT OF CALIFORNIA danlaidman@dwt.com 6 DIANA PALACIOS (State Bar No. 290923) dianapalacios@dwt.com 865 South Figueroa Street, 24th Floor Los Angeles, California 90017-2566 Telephone: (213) 633-6800 Fax: (213) 633-6899 10 Attorneys for Defendant Joseph Teixeira 11 UNITED STATES DISTRICT COURT 12 CENTRAL DISTRICT OF CALIFORNIA 13 14 CITY OF INGLEWOOD, a public entity,) Case No. 2:15-cv-01815-MWF-MRW 15 Plaintiff, 16 Assigned to the Hon. Michael Fitzgerald 17 VS. NOTICE OF LODGING OF DIGITAL VIDEO DISCS IN 18 JOSEPH TEIXEIRA and Does 1-10, SUPPORT OF DEFENDANT'S Defendants. 19 MOTION TO DISMISS AND MOTION TO STRIKE 20 Hearing Date: June 22, 2015 21 10:00 a.m. Time: Courtroom: 1600 22 LODGED CLERK, U.S. DISTRICT COURT Notice of Motion and Motion to Dismiss 23 (Rule 12(b)(6)); Notice of Motion and Motion to Strike (Rule 12(f)); Request IPR 172015 24 For Judicial Notice; Declaration of Joseph Teixeira with Ex. B; Declaration 25 DISTRICT OF CALIFORNIA Of Dan Laidman: Notice Of Manual DEPUTY Filing; and [Proposed] Orders Filed 26 Concurrently] 27 Action Filed: March 12, 2015 28

PLEASE TAKE NOTICE that Defendant Joseph Teixeira hereby lodges with the Court the following items submitted in support of the concurrently-filed Motion to Dismiss (FRCP 12(b)(6)), and Motion to Strike (FRCP 12(f)):

- 1. The DVD attached to this Notice as **Exhibit A** contains true and correct copies of the six YouTube videos that are referenced and linked in Paragraph 19 of the Complaint. See Declaration of Joseph Teixeira at ¶¶ 2-3.
- 2. The DVDs attached to this Notice as **Exhibit C** contain the City of Inglewood's official video recording of the July 20, 2010 Inglewood City Council meeting. See Teixeira Decl. ¶ 5.
- 3. The DVDs attached to this Notice as **Exhibit D** contain the City of Inglewood's official video recording of the May 22, 2012 Inglewood City Council meeting. See Teixeira Decl. ¶ 6.
- 4. The DVD attached to this Notice as **Exhibit E** contains the City of Inglewood's official video recording of the February 11, 2014 Inglewood City Council meeting. See Teixeira Decl. ¶ 7.
- 5. The DVD attached to this Notice as **Exhibit F** contains the City of Inglewood's official video recording of the April 23, 2013 Inglewood City Council meeting. See Declaration of Dan Laidman at ¶ 2.

DATED: April 17, 2015

DAVIS WRIGHT TREMAINE LLP
THOMAS R. BURKE
DAN LAIDMAN

DIANA PALACIOS

Dan Laidman

Attorneys for Defendant Joseph Teixeira

- □ VOLUMINOUS DOCUMENT
- Z CD, VIDEO, PHOTOS, OTHER, ETC.

AVAILABLE IN THE RECORDS SECTION OF THE CLERK'S OFFICE FOR PUBLIC VIEWING

G-114 (02/09)

VOLUMINOUS DOCUMENT OR NON DOCUMENT ITEM FOR PUBLIC VIEWING

- □ VOLUMINOUS DOCUMENT
- ☑ CD, VIDEO, PHOTOS, OTHER, ETC.

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OFFICE FOR PUBLIC VIEWING

G-114 (02/09)

VOLUMINOUS DOCUMENT OR NON DOCUMENT ITEM FOR PUBLIC VIEWING

Exhibit C

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

- □ VOLUMINOUS DOCUMENT
- ☑ CD, VIDEO, PHOTOS, OTHER, ETC.

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- Ø CD, VIDEO, PHOTOS, OTHER, ETC.

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Case	2:15-cv-01815-MWF-MRW Document 14 Filed 04/20/15 Page 8 of 8 Page ID #:123
2 3	I, Ellen Duncan, declare under penalty of perjury under the laws of the State of California that the following is true and correct:
4 5	I am employed in the City and County of Los Angeles, State of California, in the office of a member of the bar of this court, at whose direction the service was
6 7	made. I am over the age of eighteen (18) years, and not a party to or interested in the within-entitled action. I am an employee of DAVIS WRIGHT TREMAINE LLP, and my business address is 865 South Figueroa Street, Suite 2400, Los Angeles, CA
8	On April 17, 2015 I caused to be served NOTICE OF LODGING OF DIGITAL
10	VIDEO DISCS IN SUPPORT OF DEFENDANT'S MOTION TO DISMISS AND MOTION TO STRIKE on the party referenced below:
12 13	JoAnna M. Esty, Esq. <u>jmesty@majestylaw.com</u> Majesty Law Group PLC
14 15	6080 Center Drive, 6 th Floor Los Angeles, CA 90045 Tel: (310) 376-2512
16	Fax: (888) 618-0360
17 18	I enclosed a true and correct copy of said document in an envelope, and placed it for collection and mailing via Federal Express on April 17, 2015, for delivery on April 18, 2015. I am familiar with the practice at my
19 20	place of business for collection and processing of correspondence for overnight delivery by Federal Express.
21 22	I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.
23 24	Executed on April 17, 2015 at Los Angeles, California.
25 26	
27	Ellen Duncan Cly Signature
11	Print Name Signature